

# **EXHIBIT A**

ROBERT M. RICH  
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25 Pompton Avenue  
Verona, NJ 07044  
(973)239-2255  
Attorney for Plaintiff

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|                     |   |                              |
|---------------------|---|------------------------------|
| ANNETT OTTO FERARY, | : | SUPERIOR COURT OF NEW JERSEY |
|                     | : | LAW DIVISION-ESSEX COUNTY    |
| Plaintiff,          | : | DOCKET NO:                   |
|                     | : |                              |
| -vs-                | : |                              |
|                     | : |                              |
| STARBUCKS,          | : | CIVIL ACTION                 |
|                     | : |                              |
|                     | : | COMPLAINT AND JURY DEMAND    |
| Defendant.          | : |                              |

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Annett Otto Ferary, residing at 105 Glenridge Avenue,  
Montclair, County of Essex and State of New Jersey, by way of  
Complaint herein, says:

1. Plaintiff was a customer at the Starbucks located at the corner of Church Street and S. Park Street in Montclair, New Jersey, on October 29, 2019.
2. At the time and at the place, as aforesaid, the defendant, was entering the aforesaid premises and was caused to fall on a dangerous condition that was permitted to exist on the floor of the premises.

3. As a result of the negligence of the defendant, as aforesaid, the plaintiff sustained severe and permanent injuries, was caused to obtain medical treatment for the same and has and will continue in the future to sustain pain, suffering and disability.

WHEREFORE, plaintiff demands judgment as against the defendant for damages, interest and cost of suit.

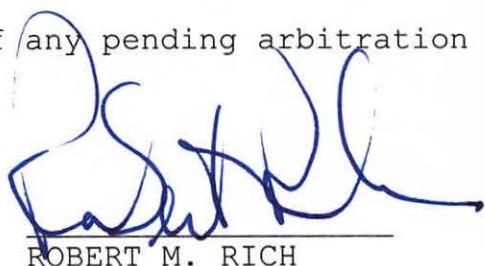


ROBERT M. RICH  
Attorney for Plaintiff

Dated: January 26, 2021

CERTIFICATION

I certify that the within matter is not the subject of any other action pending in any Court or of any pending arbitration proceeding.



ROBERT M. RICH

**DESIGNATION OF TRIAL COUNSEL**

In accordance with R.4:25-1(b), Robert M. Rich is hereby designated as trial counsel on behalf of the plaintiff.

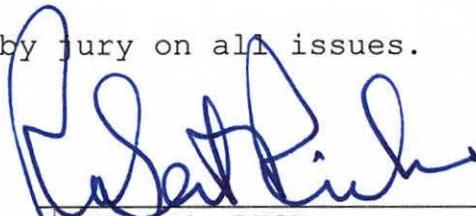


ROBERT M. RICH  
Attorney for Plaintiff

Dated: January 26, 2021

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues.



ROBERT M. RICH  
Attorney for Plaintiff

Dated: January 26, 2021

**DEMAND FOR ANSWERS TO INTERROGATORIES**

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendants provide answers to the Uniform Interrogatories set forth in Form C and C1 of Appendix II of the Rules Governing the Courts of the State of New Jersey.



ROBERT M. RICH  
Attorney for Plaintiff

**PLAINTIFF'S FIRST NOTICE TO PRODUCE TO DEFENDANTS**

Pursuant to Rule 4:18, you are hereby requested to produce the following designated documents and/or items for purposes of discovery. This material will be examined and/or photocopied; computer stored information will be printed on hard copy; magnetically recorded tapes will be copied or transcribed; and photograph negatives will be processed and photographs reproduced. Said documents or tangible things are to be produced at the offices of Robert M. Rich, Esq., 25 Pompton Avenue, Verona, New Jersey, within 30 days of the date of service hereof and supplemented thereafter in accordance with the New Jersey Civil Practice Rules.

Copies of any and all photographs, video tapes, surveillance films, reports, movies and/or computerized technology that have anything to do with the facts and circumstances of this case.

Copy of the Curriculum Vitae for each expert witness named in your client's answers to Interrogatories.

Copies of any text, treatise, article, standard, manual, policy, procedure, directive, book or writing of any kind which supports your experts' opinions in this case.

Copies of each text, treatise, article, standard, manual, policy, procedure, directive, book or writing of any kind which you intend to offer or read into evidence in this matter.

Copies of each text, treatise, article, standard, manual, policy, procedure, directive, book or writing of any kind which your expert(s) relied upon in any way in formulating their opinion(s) in this matter.

Copies of any and all X-ray films, CT scans, MRI films, or any other diagnostic test results concerning the injuries plaintiff sustained in this accident or to any prior or subsequent injuries or illnesses.

Copy of defendant operator's driver's license along with a list of any restrictions or conditions thereon.

Supply copies of any written documents that you intend to offer into evidence or utilize in any manner at the time of trial.

If this defendant has been a party to any other litigation involving a motor vehicle accident, supply all pleadings, interrogatories, deposition transcripts and/or trial manuscripts.

Copies of the records of any criminal convictions of defendant.

Copies of any summonses received by defendant in this case.

Copies of any governmental and/or regulatory agency summonses, violations, warnings or reprimands you received in connection with this incident.

Copies of any governmental and/or regulatory agency summonses, violations, warnings or reprimands defendant has received in the three years preceding the accident which is the subject of this action.

Copies of any written report of the accident or any circumstances relating to the accident made by the defendant or to the defendant or any servant, agent or employee of the defendant.



ROBERT M. RICH  
Attorney for Plaintiff

Dated: January 26, 2021

**DEMAND FOR DISCOVERY OF INSURANCE INFORMATION**

In accordance with R.4:10-2(b), plaintiff demands discovery of any and all insurance agreements or policies which may be available to satisfy part of any judgment rendered in this matter against any defendant in favor of any plaintiff. For each insurance agreement or policy available to each defendant, please provide the following: (a) the name of the insurance company; (b) the named insured; (c) the names of any additional insured; (d) the policy period; (e) the limits of coverage. Please produce this information within 30 days.



ROBERT M. RICH  
Attorney for Plaintiff

## Civil Case Information Statement

### Case Details: ESSEX | Civil Part Docket# L-001082-21

**Case Caption:** FERARY ANNETT VS STARBUCKS  
**Case Initiation Date:** 02/09/2021  
**Attorney Name:** ROBERT M RICH  
**Firm Name:** ROBERT M. RICH  
**Address:** 25 POMPTON AVE.  
VERONA NJ 07044  
**Phone:** 9732392255  
**Name of Party:** PLAINTIFF : Ferary, Annett, O  
**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** PERSONAL INJURY  
**Document Type:** Complaint with Jury Demand  
**Jury Demand:** YES - 6 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO  
**Are sexual abuse claims alleged by: Annett O Ferary?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

02/09/2021  
Dated

/s/ ROBERT M RICH  
Signed